

## THYSSEN INC. EXCLUSION REQUEST

### ATTACHMENT 4 CARBON AND ALLOY FLAT ROLLED, SPECIALIZED HOT ROLLED STRIP

- (a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States.

The merchandise subject to this request is known as carbon and alloy hot-rolled specialized hot-rolled strip – high carbon, HSLA and alloy steel, pickled and oiled, black or annealed. Rolled from slab to final width as mill-edge product, in the grades stated below.

The applicable HTS provisions are: 7208.27.0030, 7208.27.0060, 7211.19.1500, 7211.19.4500, 7211.19.6000, 7211.19.7560, 7225.30.7000, 7225.30.1000, 7226.91.7000 and 7226.91.8000.

- (b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the products from products for which exclusion is not sought;

The product described above is produced in the following grades:

SAE 1022 through 1095 for cold-rolled strip  
D6A, SAE 8660 through 4130 for seat belts  
European grades such as “16MnCr5” for truck frame rails  
Proprietary grades for machining and fineblanking

Size .060 “ - .630”

- (c) The basis for requesting an exclusion;

Domestic production is limited or non-existent.

- (d) The names and locations of any producers, in the United States and foreign countries of the product;

ThyssenKrupp - Germany. ThyssenKrupp Stahl’s Hohenlimburg mill is the only producer of narrow hot-rolled steel coils with a mill edge suitable for further cold reduction, eliminating edge cracking and hardening during further processing. In addition, extraordinary close thickness tolerances, (+/- .00234” max. is the general guideline, if one wants to compare with regular hot rolled under ASTM-A-568), coupled with a superior surface

condition and consistent mechanical and chemical properties. This production method provides a superior material for the manufacture of the products identified above.

- (e) Total U.S. Consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and the projected annual consumption for each year from 2001 to 2005, with a basis for the projection;

Estimated at 20,000 metric tons.

- (f) Total US production of the product for each year from 1996 to 2000, if any;

None, see above.

- (g) The identity of any US produced substitute for the product, total US production of the substitute for each year from 1996 to 2000, and the names of any US producers of the substitute;

The only substitute available is material produced from conventional master coils, which would require slitting to reach the desired width. However, mechanical properties, flatness and gauge properties are not comparable.

### **CONCLUSION**

We understand that the purpose of the USTR investigation is to determine appropriate remedies for the importation of certain steel products, which are produced by the domestic industry. We believe that US production of this product is non-existent. Accordingly, we respectfully request that carbon and alloy flat rolled, specialized hot-rolled strip be excluded from any import restrictions, and that the language of any remedy order for HTS subheadings listed above clearly exclude this product.